

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOSE COSME, :  
Plaintiff, : 1:21-cv-01027-JGK  
v. :  
MARKET CONNECT GROUP, INC., :  
RHONDA LEADER, individually, and :  
KEITH RIVERS, individually, :  
Defendants.  
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**JOINT REPORT PURSUANT TO FRCP 26(f) AND PROPOSED DISCOVERY PLAN**

This Civil Case Management Plan (the "Plan") is submitted by the parties in accordance with Fed. R. Civ. P. 26(f)(3):

1. The parties have engaged in settlement discussions.
2. The case is to be tried to a jury.
3. Initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure shall be completed no later than June 16, 2021.
4. All fact discovery is to be completed no later than December 9, 2021.
5. Initial requests for production of documents shall be served by July 2, 2021.
7. Interrogatories shall be served by July 2, 2021.
8. Depositions of the parties shall be completed by November 12, 2021.
9. Depositions of non-parties, if any, shall be completed by December 9, 2021.
10. All expert discovery, including disclosures, reports, production of underlying documents, and depositions, shall be completed by January 28, 2022.
11. All discovery shall be completed no later than January 28, 2022.

Dated: New York, New York  
June 1, 2021

PHILLIPS & ASSOCIATES, PLLC

By: /s/ Jesse S. Weinstein  
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